

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :
Plaintiffs, :
Plaintiffs, :
v. :
v. : Civil Action No. 05-823-*** (MPT)
STANLEY TAYLOR, et al., :
Defendants. :

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: DEFENDANTS MICHAEL KNIGHT AND CHRIS SENATO



PLEASE TAKE NOTICE that the Plaintiff, George A. Jackson, pro se, and pursuant to Federal Rule of Civil Procedure 26(a) request that Defendants, MICHAEL KNIGHT AND CHRIS SENATO, produce the following to the Plaintiffs at the Sussex Correctional Institution, P.O. Box 500, Georgetown, DE 19947, the following documents:

1. Any and all periodic preventive maintenance records that were discuss and reviewed in response to Plaintiff George A. Jackson's "emergency grievance" as stated in Defendant Michael Knight's Response to Plaintiffs Interrogatories, question no. 2.
2. A copy of all the Annual Public Health Sanitation reports during the time period July 2003 thru July 2005, including reports of DOC inspections, as stated in Defendants Michael Knight's Response to Plaintiffs' Interrogatories, question no. 10., and Chris Senato's Response to Plaintiffs' Interrogatories, question no. 10.
3. Any and all work orders that periodic preventive maintenance was performed on the air handler (ventilation) on top of the kitchen, as stated in Defendant Chris Senato's Response to Plaintiffs' Interrogatories, question no. 4.

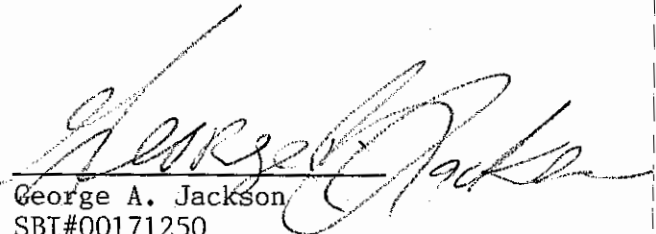
4. Produce for inspection, copying, or photographing of the SCI Main kitchen logs between July 2003 thru July 2005.

5. Any and all written/or recorded programs, including Serv Safe, for the education and training of Food Service staff in the recognition, avoidance and prevention of unsafe conditions applicable to the kitchen work environment to control or eliminate any hazard or other exposure to illness or injury.

6. All written memorandum or correspondence between Defendant Michael Knight and Chris Senato regarding the Plaintiff George A. Jackson's "emergency grievance" which forms the subject matter of the complaint.

DATED:

10/15/07

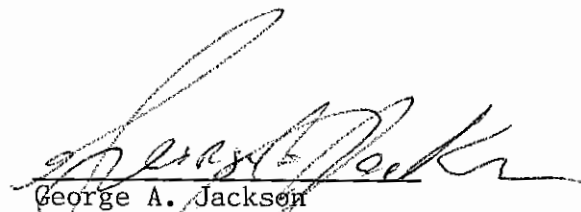


George A. Jackson
SBI#00171250
SCI
P.O. Box 500
Georgetown, DE 19947

CERTIFICATE OF SERVICE

I, George A. Jackson, hereby certify that on October 15, 2007, I filed the attached REQUEST FOR PRODUCTION OF DOCUMENTS to Defendants' counsel by placing them in the SCI prison U.S. mailbox, to be forward to:

Catherine Damavandi, ID#3823
Deputy Attorney General
Department of Justice
Carvel State Bldg., 6th Fl.
820 French St.,
Wilmington, DE 19947



George A. Jackson
Sussex Correctional
P.O. Box 500
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1/M: George A. Abramson
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